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August 11, 2020

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 8/11/2020

Re: United States of America v. Rick Dane, Jr.
20 Cr. 160-10 (MKV)
Request to Travel

Dear Judge Vyskocil:

I am the attorney for the defendant in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006 A. Mr. Dane was charged by indictment and the Court set certain conditions for his release which included a limitation on his travel. The defense is writing to request that Mr. Dane be granted permission to travel to Crete, Illinois from August 16, 2020 to August 23, 2020 to prepare his son for school.

Mr. Dane’s son attends a high school in Crete, Illinois and will be starting the 12th grade. As the school prepares to re-start under COVID-19 guidelines, Mr. Dane’s presence is necessary to obtain the proper school supplies and to otherwise prepare his son for school.

The defense respectfully requests that the Court allow Mr. Dane to drive from New York state to Crete, Illinois on August 16, 2020 as well as allow him to remain in Crete, Illinois until August 23, 2020 when Mr. Dane would drive back to New York state. In addition, the defense would respectfully ask that the Court allow Mr. Dane to travel to the nearby areas of Orland Park, Illinois and Hammond, Indiana which are the closest locations that have shopping areas where Mr. Dane can purchase supplies for his son.

The defense respectfully requests that the Court modify the conditions of Mr. Dane's release to allow him to travel from New York state to Crete, Illinois as well as the areas of Orland Park, Illinois and Hammond, Indiana from August 16, 2020 until August 23, 2020. As stated above, the travel is necessary to attend to his son's educational needs and purchase supplies for his son who is set to re-start school pursuant to the COVID-19 guidelines in Illinois. I have conferred with Mr. Dane's Pretrial officer Vincent Adams and Pretrial Services does not oppose a request for travel. In addition, the Government has no objection to this request.

Respectfully submitted,

/s/

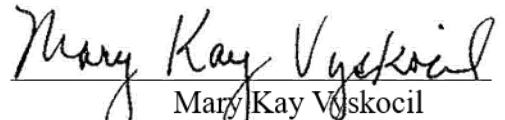
Calvin H. Scholar

cc: United States Attorney for the
Southern District of New York

Mr. Vincent Adams
SDNY Pretrial Services

GRANTED. Defendant Dane's bail conditions are modified only to permit travel from New York to Crete and Orland Park, Illinois and Hammond, Indiana (and intermediate travel points) from August 16, 2020 to August 23, 2020. Mr. Dane is reminded that during that time, he is prohibited from visiting racetracks or horse-related businesses. SO ORDERED.

Date: 8/11/2020
New York, New York


Mary Kay Vyskocil
United States District Judge